

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America

v.

Mayco Ronaldo MANZANARES-Verde

Case No. 2:24-mj-00031

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 17, 2024 in the county of Charleston in the  
South Carolina District of South Carolina, the defendant(s) violated:

## Code Section

Title 8, United States Code, Section  
 1326(a).

## Offense Description

Did knowingly and unlawfully enter and was found in the United States of America, not having obtained the express consent of the Attorney General or Secretary of Homeland Security to reapply for admission thereto; said defendant then being an alien who previously had been deported from the United States to Honduras on August 17, 2018.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complainant's signature

Bradley Long, Deportation Officer

Printed name and title

Sworn to me via telephone or other reliable electronic means  
 and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: September 30, 2024City and state: Charleston, South Carolina

Judge's signature

Molly H. Cherry, U.S. Magistrate Judge

Printed name and title

STATE OF SOUTH CAROLINA     }  
COUNTY OF CHARLESTON     }     AFFIDAVIT

I, Bradley Long, being first duly sworn, hereby depose and state as follows:

1. I am employed as a Deportation Officer with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO). I have been employed with ICE ERO since May 2009. During that time, I have received training through the ICE Basic Immigration Law Enforcement Training Program at Glynco, GA, and I have conducted investigations into both criminal and administrative matters involving violations of the United States Immigration and Nationality Act. My responsibilities include identifying and investigating illegal aliens with criminal histories that are subject to criminal prosecution, including violations of 8 U.S.C. § 1326;
2. That the information contained in this affidavit is based on my personal participation in this investigation and from information provided to me by other law enforcement officers. As this affidavit is being submitted for the limited purpose of establishing probable cause to support the arrest of Mayco Ronaldo MANZANARES-Verde (MANZANARES-Verde), for violations of federal law, including, but not limited to: 8 U.S.C. § 1326(a), I have not included each and every fact known to me concerning this investigation and have set forth only those facts that I believe are necessary for said purpose;
3. On August 16, 2015, the United States Border Patrol (USBP) encountered MANZANARES-Verde at or near Hidalgo, Texas, after he illegally entered the United States. MANZANARES-Verde was interviewed and questioned regarding his immigration status in the United States, and he admitted to entering the United States without being inspected, paroled, or admitted by an Immigration Officer. MANZANARES-Verde was assigned the FBI number 6197F2CPH and the Alien Registration Number A208 378 664. MANZANARES-Verde was served with a Notice and Order of Expedited Removal, form I-860, and on the same date the Order of Removal was executed, whereby MANZANARES-Verde was removed from the United States to Honduras. On that day, MANZANARES-Verde surrendered his fingerprint and photo for Immigration form I-296 (Notice to Alien Ordered Removed/Departure Verification) on which he signed. MANZANARES-Verde's removal was witnessed and signed by an Immigration Officer;
4. On January 16, 2017, the USBP encountered MANZANARES-Verde at or near Calexico, California, after he illegally entered the United States. MANZANARES-Verde was interviewed and questioned regarding his immigration status in the United States, and he admitted to entering the United States without being inspected, paroled, or admitted by an Immigration Officer. MANZANARES-Verde's fingerprints were obtained by the USBP and were a confirmed biometric match for FBI number 6197F2CPH. On the same date, MANZANARES-Verde was served with a Notice of Intent/Decision to Reinstate Prior Order, form I-871;

5. On February 1, 2017, the Order of Removal was executed, whereby MANZANARES-Verde was removed from the United States to Honduras. On that day, MANZANARES-Verde surrendered his fingerprint and photo for immigration form I-205 (Warrant of Removal/Deportation) on which he signed. MANZANARES-Verde's removal was witnessed and signed by an Immigration Officer;
6. On August 4, 2018, the USBP encountered MANZANARES-Verde at or near Hidalgo, Texas, after he illegally entered the United States. MANZANARES-Verde was interviewed and questioned regarding his immigration status in the United States, and he admitted to entering the United States without being inspected, paroled, or admitted by an Immigration Officer. MANZANARES-Verde's fingerprints were obtained by the USBP and were a confirmed biometric match for FBI number 6197F2CPH;
7. On August 5, 2018, MANZANARES-Verde was served with a Notice of Intent/Decision to Reinstate Prior Order, form I-871;
8. On August 7, 2018, MANZANARES-Verde was convicted in the United States District Court for the Southern District of Texas, McAllen Division, of Illegal Entry of an Alien, in violation of Title 8, United States Code, Section 1325(a)(1)(Misdemeanor). MANZANARES-Verde was sentenced to time-served and a special assessment of \$10.00;
9. On August 17, 2018, the Order of Removal was executed, whereby MANZANARES-Verde was removed from the United States to Honduras. On that day, MANZANARES-Verde surrendered his fingerprint and photo for immigration form I-205 (Warrant of Removal/Deportation) on which he signed. MANZANARES-Verde's removal was witnessed and signed by an Immigration Officer;
10. On an Unknown Date at an Unknown Location, MANZANARES-Verde illegally entered the United States;
11. On September 13, 2024, ICE Officers were contacted by the North Charleston Police Department in regard to MANZANARES-Verde having active arrest warrants for his arrest for Harassment, 1<sup>st</sup> Degree and Disseminate/Promote Obscenity Unlawfully;
12. On September 17, 2024, ICE Officers encountered MANZANARES-Verde incarcerated in the Sheriff Al Cannon Detention Center (Charleston County), North Charleston, South Carolina after he was arrested for Harassment 1<sup>st</sup> Degree and Disseminate/Promote Obscenity Unlawfully. MANZANARES-Verde's fingerprints were obtained at the Sheriff Al Cannon Detention Center (Charleston County), North Charleston, South Carolina and were a confirmed biometric match for FBI number 6197F2CPH. An immigration detainer was lodged with the Al Cannon Detention Center (Charleston County), North Charleston, South Carolina for MANZANARES-Verde;
13. On September 18, 2024, MANZANARES-Verde was released from the Al Cannon Detention Center (Charleston County), North Charleston, South Carolina on bond;

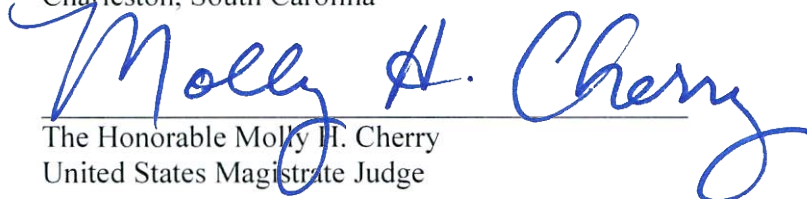
14. On September 24, 2024, ICE Officers apprehended MANZANARES-Verde near his residence in Hanahan, South Carolina. MANZANARES-Verde was interviewed and questioned regarding his immigration status in the United States, and he admitted to entering the United States without being inspected, paroled, or admitted by an Immigration Officer. MANZANARES-Verde's fingerprints were obtained at the ICE Office in North Charleston, South Carolina and were a confirmed biometric match for FBI number 6197F2CPH. On that same date, MANZANARES-Verde was served with a Notice of Intent Decision to Reinstate Prior Order, form I-871;
15. A Record check in the Computer Linked Application Informational Management System (CLAIMS) revealed no record MANZANARES-Verde filed an application for permission to reapply for admission into the United States or from the Secretary of Homeland Security, for re-admission into the United States as required by law. On September 24, 2024, this was confirmed by the issuance of the certificate of nonexistence of record from the United States Citizenship and Immigration Services;
16. Based on the foregoing, I submit there is probable cause to believe that Mayco Ronaldo MANZANARES-Verde, is in violation of 8 U.S.C. § 1326(a), in that, on or about September 17, 2024, in the County of Charleston in the District of South Carolina, he did knowingly and unlawfully enter and was found in the United States of America, not having obtained the express consent of the Attorney General or Secretary of Homeland Security to reapply for admission thereto; said defendant then being an alien who previously had been deported from the United States to Honduras, on August 17, 2018.

This Affidavit has been reviewed by AUSA Dean H. Secor.

  
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Bradley Long, Deportation Officer  
United States Immigration and Customs Enforcement

SWORN TO ME VIA TELEPHONE OR  
OTHER RELIABLE ELECTRONIC MEANS  
AND SIGNED BY ME PURSUANT TO  
FED. R. CRIM. P. 4.1 AND 4(d) OR 41(d)(3),  
AS APPLICABLE.

This 30 day of September 2024  
Charleston, South Carolina

  
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The Honorable Molly H. Cherry  
United States Magistrate Judge